

ADVANCED CODING TECHNOLOGIES
LLC,

Plaintiff,

v.

APPLE INC.,

Defendant.

§
§ Case No. 2:24-cv-00572-JRG
§ (LEAD CASE)
§
JURY TRIAL DEMANDED
§
§ [REDACTED]
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ADVANCED CODING TECHNOLOGIES LLC,

Plaintiff,

v.

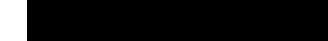
APPLE INC.,

Defendant.

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Case No. 2:24-cv-00687-JRG
(MEMBER CASE)

JURY TRIAL DEMANDED



1. I have personal knowledge of the facts set forth in this declaration. I am competent to testify as to all matters stated, and I am not under any legal disability that would in any way preclude me from testifying.

2. I am a Partner at the law firm of Fabricant LLP and counsel of record for Plaintiff Advanced Coding Technologies LLC in this matter.

3. The exhibits attached to this declaration may contain annotations and/or excerpts of the originals.

4. Attached hereto as Exhibit 1 is a true and correct copy of a Claim Construction Order (Dkt. 155) in *Advanced Coding Technologies LLC v. LG Electronics Inc., et al.*, Case No. 2:22-cv-0050-JRG (E.D. Tex.), dated July 21, 2024.

5. Attached hereto as Exhibit 2 is a true and correct copy of a press release dated December 13, 2018 entitled “Apple to build new campus in Austin and add jobs across the US,” taken from <https://www.apple.com/newsroom/2018/12/apple-to-build-new-campus-in-austin-and-add-jobs-across-the-us/> on November 12, 2024.

6. Attached hereto as Exhibit 3 is a true and correct copy of a screenshot of the LinkedIn profile of Apple employee, David Wilson, Graphics Software Engineer at Apple, captured on November 12, 2024, and available at <https://www.linkedin.com/in/dawilson/>.

7. Attached hereto as Exhibit 4 is a true and correct copy of a screenshot of the LinkedIn profile of Apple employee, Afshin Nourivand, SoC Design Verification at Apple, captured on November 12, 2024, and available at <https://www.linkedin.com/in/afshin-nourivand-8482958/>.

8. Attached hereto as Exhibit 5 is a true and correct copy of a screenshot of the LinkedIn profile of Samsung Electronics America employee, Sean Diaz, Director Corporate Accounting at Samsung, captured on November 12, 2024, and available at <https://www.linkedin.com/in/sean-diaz-14477817/>.

9. Attached hereto as Exhibit 6 is a true and correct copy of Plaintiff's Second Amended Initial and Additional Disclosures to Apple Inc., served November 18, 2024.

10. Attached hereto as Exhibit 7 is a true and correct copy of Defendant Apple Inc.'s First Amended Initial and Additional Disclosures, served November 13, 2024.

11. Attached hereto as Exhibit 8 is a true and correct copy of U.S. Patent Application Publication No. US2008/0137753 to He published June 12, 2008.

12. Attached hereto as Exhibit 9 is a true and correct copy of a screenshot of the LinkedIn profile of Google employee, Fyodor Kyslov, Senior Software Engineer at Google, captured on November 12, 2024, and available at <https://www.linkedin.com/in/fyodorkislov/>.

13. Attached hereto as Exhibit 10 is a true and correct copy of a screenshot of Contact Longford Capital Management, LP, taken on November 12, 2024 from <https://www.longfordcapital.com/contact>.

14. Attached hereto as Exhibit 11 is a true and correct copy of a paper entitled "AV1 Technical Overview – A Summary" by Mukul Shirvaikar, Ph.D.

15. Attached hereto as Exhibit 12 is a true and correct copy of a paper entitled "A comparative study of the AV1 and HEVC video codecs" by Mukul Shirvaikar, Ph.D.

16. Attached hereto as Exhibit 13 is a true and correct copy of The Federal Judiciary Statistics for the period ending June 30, 2024, showing the EDTX's median time from filing to trial is 21.6 months and compared to NDCA's median time of 48.9 months.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on November 18, 2024 in Short Hills, New Jersey.

/s/ Peter Lambrianakos
Peter Lambrianakos